

ADAM K. BULT, ESQ., Nevada Bar No. 9332
abult@bhfs.com
TRAVIS F. CHANCE, ESQ., Nevada Bar No. 13800
tchance@bhfs.com
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135

Attorneys for Plaintiffs,
CANTERS DELI LAS VEGAS, LLC and
CANTERS DELI TIVOLI VILLAGE LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CANTERS DELI LAS VEGAS LLC, a citizen
of the state of California; and CANTERS
DELI TIVOLI VILLAGE LLC, a citizen of the
State of California,

Plaintiffs,

v.

BANC OF AMERICA MERCHANT
SERVICES, LLC, a citizen of the States of
Delaware and Georgia; BANK OF AMERICA,
N.A., a citizen of the State of North Carolina;
FREEDOMPAY, INC., a citizen of the States
of Delaware and Pennsylvania; and DOES 1
through 10,

Defendants.

CASE NO.: 2:18-cv-01908-KJD-NJK

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND RESPONSE AND
REPLY DEADLINES IN
CONNECTION WITH DEFENDANT
FREEDOMPAY, INC.'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE,
TO TRANSFER VENUE TO THE
EASTERN DISTRICT OF
PENNSYLVANIA**

[SECOND REQUEST]

Plaintiffs CANTERS DELI LAS VEGAS LLC and CANTERS DELI TIVOLI VILLAGE
LLC (together, "Canter"), and Defendant FREEDOMPAY, INC. ("FreedomPay"), by and
through their undersigned counsel of record, hereby stipulate and agree to extend the reply
deadline in connection with Defendant FreedomPay, Inc.'s Motion To Dismiss or, in the
Alternative, to Transfer Venue to the Eastern District of Pennsylvania filed on November 8, 2018
("Motion to Dismiss"), as follows:

WHEREAS, the parties previously agreed to extend the response and reply deadlines
associated with the Motion to Dismiss (*see* ECF No. 17);

WHEREAS, due to a clerical error, the stipulation submitted to the Court erroneously

identified the reply response as December 10, 2018, instead of December 17, 2018, as the parties agreed. The Court then granted the stipulation, such that the current deadline is currently set for December 10, 2018 (*see* ECF No. 18); and

WHEREAS, the parties therefore seek the Court's approval to extend the deadline for FreedomPay to file its reply in support of its Motion to Dismiss, and this is their second request.

THEREFORE, in consideration of the foregoing, the parties request that the Court modify the briefing schedule, as follows:

2. That the deadline for FreedomPay to file a reply in support of FreedomPay's Motion to Dismiss is extended up to and including **December 17, 2018**.

DATED this 4th day of December, 2018

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Adam K. Bult

ADAM K. BULT, ESQ. (SBN: 9332)
abult@bhfs.com
TRAVIS F. CHANCE, ESQ. (SBN: 13800)
tchance@bhfs.com
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106

*Attorneys For Plaintiffs,
CANTERS DELI LAS VEGAS, LLC and
CANTERS DELI TIVOLI VILLAGE LLC*

DATED this 4th day of December, 2018

GORDON REES SCULLY MANSUKHANI,
LLP

By: /s/ Craig J. Mariam

CRAIG J. MARIAM (SBN: 10926)
cmariam@grsm.com
LYNNE K. McCHRYSTAL (SBN: 14739)
lmcchrystal@grsm.com
300 S. 4th Street, Suite 1550
Las Vegas, Nevada 89101

*Attorney for Defendant
FREEDOMPAY, INC.*

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: December 12, 2018